

EXHIBIT A

Sam Katz

From: Sam Katz
Sent: Sunday, April 12, 2020 11:01 PM
To: christopher.schueller@bipc.com
Cc: Michael B. Wolk; Sam Katz
Subject: CCRF 2007-MF1 East 53 Complex LLC v. East 53 BSD LLC et al., 1:19-cv-02553

Mr. Schueller:

My office will be substituting in as counsel in place of Mr. Wolk on behalf of Defendants East 53 BSD LLC and Solomon Singer (defendants) in this action. Due to the COVID-19 virus which has infected me several weeks ago and from which I am currently still recovering, I have been unable to prepare the substitution of counsel and to review the pleadings in this matter and familiarize myself with the details of the allegations herein. I expect to have the substitution of counsel filed sometime later this week. Additionally, due to my situation I request an extension of time of 30 days from today to file a response to the amended complaint. My understanding is that you have filed a certificate of default request against the defendants. I also request that you withdraw same in light of the extension request.

I look forward to hearing from you and to the anticipated courtesy. Thank you.

Please stay safe and healthy.

Best,
Sam

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